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**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE:	§	
	§	
CIRCUIT CITY STORES, INC., <i>et al</i>,	§	CASE NO. 08-35653-KRH
	§	Jointly Administered
	§	
DEBTORS.	§	CHAPTER 11

**STIPULATION BETWEEN (I) THE CIRCUIT CITY STORES, INC.
LIQUIDATING TRUST AND (II) RAYMOND & MAIN RETAIL, LLC**

On November 10, 2008 (the “Petition Date”), the above-captioned debtors (the “Debtors”) each filed a voluntary petition for relief under Chapter 11 of the United States Code in the United States Bankruptcy Court for the Eastern District of Virginia (the “Court”).

On January 30, 2009, Raymond & Main Retail, LLC (the “Claimant”) filed two proofs of claim, Claim Nos. 8985 and 8988 (the “Claims”), each in the amount of \$856,459.10.

On February 25, 2011, the Circuit City Stores, Inc. Liquidating Trust (the “Liquidating Trust”), through Alfred H. Siegel, the alleged trustee of the Trust (the “Trustee”), filed an objection to the Claims [Dkt. No. 10046] (the “First Objection”).

On April 7, 2011, the Claimant filed its response to the First Objection. (See Dkt. No. 10329). On April 13, 2011, the Claimant filed its amended response to the First Objection. (See Dkt. No. 10543). The response and amended response will together be referred to herein as the “Response.”

In the Response, the Claimant states that it “previously asserted the amount of its Claims to be \$856,459.10, based on one year’s rent” but that “[u]pon further review ... the correct amount of the Claims is \$1,340,006.72” based on 15% of the gross rent remaining under the Claimant’s lease with Circuit City, and the Claimant provides the figures and calculations used to reach \$1,340,006.72.

On or about April 20, 2012, the Liquidating Trust filed another objection to the Claims [Dkt. No. 11852] (the “Second Objection”, and together with the First Claim Objection, the “Claim Objections”).

On or about August 31, 2012, the Claimant filed an amended claim to Claim No. 8985 and an amended claim to Claim No. 8988, each in the amount of \$1,340,006.72.

The Liquidating Trust has agreed that the deadline for the Claimant to respond to the Claim Objections is currently October 2, 2012.

On August 15, 2012, the Liquidating Trust filed a Motion For Order Automatically Expunging Claims and Related Relief [Dkt. No. 12334] (the “Motion to Expunge”).

In an effort to avoid the cost of litigation between the Claimant and the Liquidating Trust (collectively, the “Parties”), the Parties do hereby STIPULATE AND AGREE as follows:

The Motion to Expunge and any order entered, or to be entered, regarding the Motion to Expunge shall not apply to the Claims, as amended. Such Claims, as amended, shall not be stricken or expunged from the records of the Court or Kurtzman Carson Consultants based on the Motion to Expunge or any order entered on that motion, and the Liquidating Trust shall give Kurtzman Carson Consultants LLC written instruction to that effect.

The Claim Objections shall be deemed filed against the Claims, as amended.

If the Claimant is required to provide additional documentation in support of the either or both of the Claims, as amended, then the Claimant may provide such additional documentation or information (the “Additional Information”) without the need to further amend the Claims.

The Liquidating Trust reserves its right to assert that the Claimant did not timely amend its Claims (except not based on the Motion to Expunge and any Order entered on that motion), and that any Additional Information is untimely, and the Claimants reserve their right to oppose, and assert any defenses or objections with respect to, any such assertion by the Liquidating Trust.

Dated: August 31, 2012

ACCEPTED AND AGREED TO BY:

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